

Robert W. Horn  
ROBERT W. HORN, P.C.  
P.O. Box 4199  
230 East Broadway, Suite 3A  
Jackson, WY 83001  
Tel: (307) 733-5747  
Fax: (307) 733-8215  
Email: rhornatty@bliss.net

**UNITED STATES DISTRICT COURT  
for the  
DISTRICT OF WYOMING**

HEALTHTECH MANAGEMENT SERVICES, INC.,        )  
    )  
Plaintiff,    )  
    )  
vs.    ) CASE NO. 1:12-cv-00042-NDF  
    )  
PAUL CARDWELL,                                    )  
    )  
Defendant.    )  
  
POWELL VALLEY HEALTH CARE, INC., a Wyoming    )  
non-profit corporation,                                )  
    )  
Cross Claimant,                                    )  
    )  
vs.    )  
    )  
HEALTHTECH MANAGEMENT SERVICES, INC.;        )  
PAUL CARDWELL and MICHAEL J. PLAKE,        )  
    )  
Cross Defendants.                                    )

**PAUL CARDWELL'S ANSWER TO CROSS CLAIM OF  
HEALTHTECH MANAGEMENT SERVICES, INC.**

Comes now Paul Cardwell (“Cardwell”), by counsel, and for his Answer to the Cross Claim filed against him by HealthTech Management Services, Inc.. (“HealthTech”), states the following:

**I. GENERAL DENIAL**

Cardwell generally denies all allegations in the Cross Claim.

## **II. REASSERTION OF ANSWERS TO COMPLAINT**

This cause was initiated by HealthTech's Complaint against Cardwell which asserted in 32 numbered paragraphs the same factual allegations now made by HeathTech against Cardwell in its newly filed Cross Claim against Cardwell. Cardwell timely filed his Answer and Affirmative Defenses to those allegations and in answer to HealthTech's Cross Claim against him, reasserts by reference his answers and defenses to the Complaint as if otherwise fully set forth herein.

## **III. DENIAL AS TO ALLEGATIONS AGAINST OTHER PARTIES**

As to each allegation in the Cross Claim that asserts that Powell Valley Healthcare, Inc. and/or Michael J. Plake acted or failed to act in a described manner, those allegations are addressed to those Parties and not as to Cardwell and to the extent such allegations require Cardwell to provide a response, he denies each such allegation.

Wherefore, Paul Cardwell, prays that HealthTech's demands for relief be denied, that judgment be entered in favor of Cardwell on HealthTech's Cross Claim, that HealthTech take nothing by way of its Cross Claim against him and for all other just and proper relief.

Respectfully submitted,

Attorneys for Paul Cardwell

/s/ Robert W. York

Robert W. York, admitted *Pro Hac Vice*  
ROBERT W. YORK & ASSOCIATES  
7212 North Shadeland Avenue, Suite 150  
Indianapolis, IN 46250  
Tel: (317) 842-8000  
Fax: (317) 577-7321  
Email: rwyork@york-law.com

/s/ Robert W. Horn

Robert W. Horn, # \_\_\_\_\_  
ROBERT W. HORN, P.C.

P.O. Box 4199  
230 East Broadway, Suite 3A  
Jackson, WY 83001  
Tel: (307) 733-5747  
Fax: (307) 733-8215  
Email: rhornatty@bliss.net

**CERTIFICATE OF SERVICE**

I hereby certify that on \_\_\_\_\_, 2012, a copy of the foregoing Answer was filed electronically. Notice of this filing will be sent to the following parties by operation of the Court's CM/ECF system.

Bradley T. Cave, P.C. HOLLAND & HART Attorneys for HealthTech 2515 Warren Ave., Suite 450 P.O. Box 1347 Cheyenne, WY 82003 <a href="mailto:bcave@hollandhart.com">bcave@hollandhart.com</a>	Joanna R. Vilos HOLLAND & HART Attorneys for HealthTech 2515 Warren Ave., Suite 450 P.O. Box 1347 Cheyenne, WY 82003 <a href="mailto:jvilos@hollandhart.com">jvilos@hollandhart.com</a>
Eli J. Richardson BASS, BERRY & SIMS PLC Attorneys for HealthTech 150 Third Avenue South, Suite 2800 Nashville, TN 37201 <a href="mailto:richardsonej@bassberry.com">richardsonej@bassberry.com</a>	Tracy J. Coopenhaver COPENHAVER, KATH, KITCHEN & KOLPITCKE Attorneys for Powell Valley Healthcare P.O. Box 839 Powell, WY 82435 <a href="mailto:tracy@ckattorneys.net">tracy@ckattorneys.net</a>
Michael Reese MICHAEL REESE, LLC Attorney for Michael Plake The Colony Building 211 West 19th Street Suite 400 Cheyenne, WY 82001 <a href="mailto:mike@mhrwylaw.com">mike@mhrwylaw.com</a>	

/s/ Robert W. Horn  
Robert W. Horn